

EXHIBIT 13

Unredacted Version of Document
Sought to be Sealed

Sjoblom-Tyler, Monica K.

From: Greenblatt, Nathan
Sent: Tuesday, March 6, 2018 2:43 PM
To: QE_Huawei v. Samsung
Cc: Huawei-Samsung Sidley
Subject: Huawei v. Samsung - Deficiencies in Samsung's Doc. Prod. and Dep. Testimony

Counsel:

I write regarding deficiencies in Samsung's document production and 30(b)(6) deposition testimony. Please respond in writing by March 8, or let us know when you are available to confer regarding the below issues.

1. **Technical Documents.** Recent depositions of Samsung witnesses have revealed that Samsung's technical document production is incomplete in important respects. Mr. Yun testified that Samsung has not produced the latest versions of design documents [REDACTED]. See Yun Dep. Tr. at 60:5-10, 64:1-25. Please produce these documents by the close of fact discovery, and confirm you will at our option either make a witness available to testify regarding the new documents in the U.S. or stipulate to their authenticity and relationship to the earlier versions.
2. [REDACTED]
[REDACTED] by the close of fact discovery, and confirm you will at our option either make a witness available to testify regarding the new documents in the U.S. or stipulate to their authenticity.
3. **Young Seok Jung's Lack of Preparation.** Mr. Jung was not adequately prepared for his deposition. He repeatedly stated he lacked knowledge about basic facts related to the operation of Samsung's products, for which he should have been prepared to testify. Mr. Jung's deposition transcript is replete with evidence of his lack of preparation, including on basic issues regarding the operation of the Samsung products for which he was designated to testify. Examples from just the first 50 pages of his transcript include the following. See, e.g., Jung Dep. Tr. at 14:5-13, 16:17-18, 16:19-23, 17:24-18:19, 20:25-21:2, 22:23-23:3, 23:12-22, 27:19-28:1, 28:5-10, 28:11-20, 29:7-22, 31:12-25, 33:13-16, 33:21-25, 36:11-15, 28:19-22, 39:16-21, 40:1-6, 40:7-12, 43:11-13, 43:16-21, 46:14-19, 47:12-14, 47:17-21, 49:3-7, 49:11-15, 49:16-18, 50:9-12, 50:13-17, 50:18-21, 50:25-51:2, 52:20-22, 53:5-10, 53:18-23, 55:15-19, 55:20-25, 56:8-14. [REDACTED]
[REDACTED] Please confirm that you [REDACTED]
[REDACTED] hich Mr. Jung was design
4. [REDACTED]. Please provide an update on the status of this document production. Please confirm that this [REDACTED] will be produced by the close of fact discovery.
5. **Apple/Samsung Litigation Documents.** Please provide an update on the status of this document production. We requested certain materials from the Apple/Samsung litigations on or before Nov. 16, 2017, and were assured that they would be produced upon clearance of Apple's objections, which we understand has taken place. However, Vol. 55 of Samsung's production contains only a handful of transcripts, and does not contain the following documents we specifically requested. Please point to where these documents have been

produced, or confirm that will be produced by the close of fact discovery. We reserve the right to request a witness to testify regarding any late-produced documents.

- Stasik Deposition Testimony
- Stasik Trial Testimony
- Ahn Deposition Testimony
- Ahn Trial Testimony (if any)
- David Teece reports (those related to Samsung SEPs)
- David Teece Deposition Testimony
- David Teece Trial Testimony
- Deposition & Trial Testimony of Samsung witnesses related to licensing and FRAND-related topics, including but not limited to:
 - James Kearn
 - Kenneth Korea
 - Heung-Mo Lee
 - Karl Heinz Rosenbrock
 - Minhyung Chung

6. [REDACTED] **Documents.** Please provide an update on the status of this document production. Please confirm that copies of the requested documents will be produced with improper redactions lifted, per my conversation with Mr. Stake, by the close of fact discovery. As previously stated, we reserve the right to request a witness to testify regarding these documents after their production.

Best regards,

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